

## REMARKS

Applicant is in receipt of the Office Action mailed March 9, 2006. Claims 1-56 were pending in the application. Claims 22-33 have been cancelled. Claims 57-68 have been added. Claims 1, 10, 14, 34, 38-39, 43, and 45-53 have been amended. Accordingly, claims 1-21 and 34-68 are now pending in the application.

### 35 U.S.C. 112 Rejections

Claims 1-56 were rejected under 35 U.S.C. 112, first paragraph, as failing to comply with the written description requirement. Claims 1-52 were rejected under 35 U.S.C. 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which applicant regards as the invention. Claims 22-33 have been cancelled, therefore the rejection with respect to claims 22-33 is now believed moot. Furthermore, Applicant has amended claims 1, 10, 14, 34, 38-39, 43, and 45-46, 48, and 53 to overcome these rejections.

Applicant requests examination of added claims 57-68. Support for the added claims 57-68 may be found at least in paragraph [0043], the abstract, paragraph [0008], paragraphs [0038]-[0039], and Figure 3 of the disclosure. For instance, paragraph [0043] and Figure 3 teach, "As a solution to the IR drop problem, the present invention forms strips out of the outer portions of the pads for the multi-level voltage I/Os and the data I/Os", and "data I/O pad 310 can function properly with narrower metal contacts without detrimental effects. Accordingly, the present invention allocates strips 312a and 314a from the data contacts for parallel connections to the power busses 304a and 308a, respectively...Similar strips can be made on the positive and negative multi-level voltage pads".

Thus, with respect to claim 57 and those dependent thereon, Applicant's Specification clearly discloses an I/O pad comprising a deposited conductor forming a metal contact and a strip of deposited conductor, wherein the deposited conductor forming the metal contact is narrower than the power supply I/O pad in order to make

room for the strip of deposited conductor. With respect to claim 63 and those dependent thereon, Applicant's Specification clearly discloses "a first portion" (e.g., data I/O pad 310, inner portion), "a second portion" (e.g., one of conductive strips 312a and 314a, outer portions), "a third portion" (claim 67) (e.g., the remaining one of conductive strips 312a and 314a, outer portions).

#### Prior Section 103 Rejections

Additionally, Applicant respectfully submits that amended claims 1, 34, and 53 are allowable over the previously cited references. In particular, amended claims 1, 34, and 53 are allowable over Yao (U.S. Patent No. 5,838,204).

Yao teaches a method and apparatus for setting simultaneous switching operating (SSO) limits for an application specific integrated circuit (ASIC) including a phase-locked loop (PLL) (see column 2 and column 10, lines 53-64). Applicant respectfully submits that Yao fails to teach or suggest, "a strip of deposited conductor located alongside the I/O pad of the first type, wherein the strip is connected to a second point on the integrated circuit, and wherein the I/O pad of the first type is narrower than the power supply I/O pad in order to make room for the strip" as recited by claim 1. The Examiner admits that Yao does not show "the I/O pad of the first type is narrower than the power supply I/O pad in order to make room for the strip". However, the Examiner contends that "it would have been obvious to one of ordinary skill in the art at the time the invention was made for the I/O pad of the first type is narrower than the power supply I/O pad so as to allow space for the strip, since the power provides more power to the device". Applicant respectfully disagrees.

The mere fact that references can be combined or modified does not render the resultant combination obvious unless the prior art also suggests the desirability of the combination. *In re Mills*, 916 F.2d 680, 16 USPQ2d 1430 (Fed. Cir. 1990). Although a prior art device "may be capable of being modified to run the way the apparatus is claimed, there must be a suggestion or motivation in the reference to do so." 916 F.2d at 682, 16 USPQ2d at 1432. (Emphasis added)

Applicant submits that Yao lacks a suggestion or motivation to modify the bond pads 606 of Yao to include the above-highlighted features of claim 1. Applicant submits that the Examiner has simply argued that the modification of Yao is obvious without showing evidence in the reference of a suggestion or motivation to modify, which is clearly hindsight analysis.

Furthermore, the Examiner argued that “another portion of 606” (bond pad 606) of Yao teaches “a strip of deposited conductor located alongside the I/O pad of the first type” as recited by claim 1. Applicant respectfully disagrees. Yao fails to teach that each of the bond pads 606 of Yao includes “a strip of deposited conductor located alongside the I/O pad of the first type” as recited by claim 1.

Accordingly, claim 1 is believed to patentably distinguish over Yao. Claims 2-21, 49-50, and 52 are dependent upon claim 1 and are therefore believed to patentably distinguish over Yao for at least the same reasons.

Likewise, claims 34 and 53 recite features similar to those highlighted above with regard to claim 1 and also additional novel features, and are therefore believed to patentably distinguish over Yao for at least the reasons given in the above paragraphs discussing claim 1. Claims 35-48 and 51 are dependent upon claim 34 and claims 54-56 are dependent upon claim 53, and are therefore believed to patentably distinguish over Yao for at least the same reasons.

New independent claims 57 and 63, and those dependent thereon, are allowable over the prior cited references for at least the reasons given above.

## **CONCLUSION**

Applicant submits the application is in condition for allowance, and an early notice to that effect is requested.

Respectfully submitted,

/James W. Huffman/

---

James W. Huffman  
Reg. No. 35,549  
ATTORNEY FOR APPLICANT(S)

Date: 8/23/06